

IN THE UNITED STATES BANKRUPTCY COURT FOR  
THE DISTRICT OF PUERTO RICO

VICTOR M. MALDONADO  
MORALES

CASE 08-01696

CHATER 13

**DEBTOR**

RG PREMIER  
**Movant**

INDEX

JOSE CARRION  
**TRUSTEE**

REPLY TO Motion Requesting Relief of Stay

TO THE HONORABLE COURT:

COMES NOW DEBTOR, through his undersigned attorney and respectfully states and prays:

1- That secured creditor RG PREMIER filed a Motion Requesting Relief of Stay Under 11 USC 362 grounded on debtor's arrears with his post petition Mortgage payments.

2- That secured creditors RG Premier will be pay in full through the Chapter 13 plan payments. (See docket 44- Trustee position).

3- Debtor is current with his Chapter 13 plan payments.

WHEREFORE, DEBTOR requests that the Motion for relief of Stay under 11 U.S.C 362 be denied.

RESPECTFULLY SUBMITTED.

In San Juan Puerto Rico, March 28th ,2009

**CERTIFICATE OF SERVICE: That I electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will send notification of such filing and that I have mailed the documents to the and non CM/ECF participants, Creditors and parties in interest as per the Master address list.**

/S/WILBERTLOPEZ MORENO  
Representing Victor M.  
Maldonado Morales  
1272 Jesus T Pinero  
San Juan PR 00921  
793 5790/782-5364

Label Matrix for local noticing  
0104-3  
Case 08-01696-ESL13  
District of Puerto Rico  
Old San Juan  
Sat Mar 28 11:48:06 AST 2009

US Bankruptcy Court District of P.R.  
U.S. Post Office and Courthouse Building  
300 Recinto Sur Street, Room 109  
San Juan, PR 00901-1964

R&G PREMIER BANK OF PUERTO RICO  
ISMAEL H. HERRERO III  
P O BOX 362159  
SAN JUAN PR 00936-2159

USDA RURAL HOUSING SERVICE  
Centralized Servicing Center, USDA  
P.O. Box 66879  
St. Louis, MO 63166-6879

MONSITA LECAROS ARRIBAS  
OFFICE OF THE US TRUSTEE (UST)  
OCHOA BUILDING  
500 TANCA STREET SUITE 301  
SAN JUAN, PR 00901-1938

End of Label Matrix  
Mailable recipients 14  
Bypassed recipients 0  
Total 14

R&G PREMIER BANK OF PR  
ISMAEL H HERRERO III ESQ  
PO BOX 362159  
SAN JUAN, PR 00936-2159

LLCDO JUAN C FORTUNO  
P O BOX 9300  
SAN JUAN, PR 00908-0300

RG PREMIER  
PO BOX 2510  
GUAYNABO, PR 00970-2510

IRIS CELIA COLL BAHAMONDE  
ALTURAS DE RIO GRANDE  
DD 48 CALLE H  
RIO GRANDE, PR 00745-3401

VICTOR MANUEL MALDONADO MORALES  
ALTURAS DE RIO GRANDE  
DD 48 CALLE H  
RIO GRANDE, PR 00745-3401

USDA RURAL DEVELOPMENT  
C/O FORTUNO & FORTUNO FAS  
PO BOX 9300  
SAN JUAN, PR 00908-0300

PUERTO RICO ELECTRIC POWER  
BANKRUPTCY CLAIMS OFFICE  
PO BOX 364267  
SAN JUAN PR 00936-4267

USDA RD  
654 PLAZA AVE MUNOZ RIVERA STE 601  
SAN JUAN, PR 00918

JOSE RAMON CARRION MORALES  
PO BOX 9023884  
SAN JUAN, PR 00902-3884

WILBERT LOPEZ MORENO  
WILBERT LOPEZ MORENO & ASOCIADOS  
1272 AVE. JESUS T. PINERO  
SAN JUAN, PR 00921-1616